

1 BOERSCH SHAPIRO LLP
David W. Shapiro (State Bar No. 219265)
2 Dshapiro@boerschshapiro.com
Martha Boersch (State Bar No. 126569)
3 Mboersch@boerschshapiro.com
Lara Kollios (State Bar No. 235395)
4 Lkollios@boerschshapiro.com
1611 Telegraph Ave., Ste. 806
5 Oakland, CA 94612
6 Telephone: (415) 500-6640

7 Attorneys for Non-party
8 Richard Jacobs

UNITED STATES DISTRICT COURT
9
NORTHERN DISTRICT OF CALIFORNIA
10
SAN FRANCISCO DIVISION
11

12 WAYMO LLC,

13 Plaintiff,

14 v.

15 UBER TECHNOLOGIES, INC.,

16 Defendant.
17

Case No. 17-cv-0939-WHA

**DECLARATION OF MARTHA BOERSCH
IN SUPPORT OF NON-PARTY RICHARD
JACOBS' MOTION FOR LEAVE TO FILE
MOTION FOR RECONSIDERATION**

1 1. I, MARTHA BOERSCH, am an attorney licensed to practice law before the courts of
2 the State of California and this Court. I make this declaration in support of Non-party Richard
3 Jacobs' Motion for Leave to File Motion for Reconsideration. I have personal knowledge of the facts
4 stated herein and, if called upon, could and would testify competently thereto under oath.

5 2. Jacobs requests Redaction No. 3 regarding his work at the [REDACTED]
6 [REDACTED]
7 [REDACTED]
8 [REDACTED]
9 [REDACTED]
10 [REDACTED]
11 [REDACTED].

12 3. Given the Court's December 11, 2017, Order Re Communications from Attorney
13 Esther Chang (Dkt. No. 2361), counsel will not serve Waymo with a copy of the proposed redactions
14 to the Halunen Letter.

15 4. Attached hereto as Exhibit A is a true and correct copy of the redacted Halunen Letter.
16 I declare under penalty of perjury under the laws of the United States that the foregoing is true
17 and correct. Executed on this 12 day of December 2017, in Oakland, California.

18
19 /s/ Martha Boersch
20 Martha Boersch